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April 25, 2019

*Via ECF Filing*

Hon. Katherine Polk Failla  
United States District Court for the  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: MORENA ORUE, et al., v. ARTISANAL FROMAGERIE & BISTRO, LLC, et al. -  
Case No. 15 Civ. 5727 (KPF)

Dear Judge Failla:

Last October, the parties amended the stipulation in light of the continued unemployment of both Sarid Drory and the guarantor of the settlement that was previously approved by the Court, Stephanie Schulman. Since then, they have continued to pay \$5,000 per month as agreed, and have now paid \$135,000 to date. Under the revision, an increased payment of \$25,000 was due on April 20, 2019, with a final payment of \$25,000 due on May 20, 2019.

Unfortunately, the economic picture for Mr. Drory and Ms. Schulman has not improved as hoped, and they continue without employment. Given the current financial status of Mr. Drory and Ms. Schulman, they are essentially judgment proof, having now exhausted even their last IRA. Indeed, since the last settlement, additional judgments have been entered against both Mr. Drory and Ms. Schulman by other creditors arising out of the failed restaurant.

However, they remain committed to completing the settlement payments they agreed to in this matter, and want to work out a payment schedule that is realistic given their current status. Until such time as they obtain employment, they can only continue to make monthly payments of \$5,000, which has been difficult, and is being funded from loans and relatives. We have proposed this schedule to counsel for the Plaintiffs, who rejected it out of hand, and served a default notice.

GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP

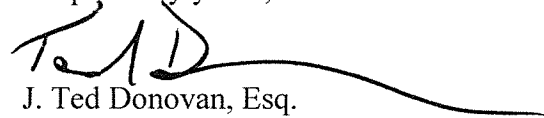
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Accordingly, we respectfully request a conference in the hope that a solution may be found short of the entry of a default judgment.

Respectfully yours,

A handwritten signature in black ink, appearing to read "J. Ted Donovan", followed by a long horizontal line extending to the right.

J. Ted Donovan, Esq.

Cc: Arsenio Rodriguez, Esq. (Via Email)  
Nancy A. Temple, Esq. (Via Email)  
Ms. Stephanie Schulman (Via Email)  
Mr. Sarid Drory (Via Email)